

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

HENRY NARANJO and  
MARLENE RAMIREZ,

Plaintiffs,

vs.

STEPHEN BYRON SMITH,

Defendant/  
\_\_\_\_\_

CASE NO. 00-6022-CIV-LENARD  
MAGISTRATE JUDGE TURNOFF

**ANSWER OF STEPHEN BYRON SMITH TO AMENDED COMPLAINT**

Defendant STEPHEN BYRON SMITH, by and through his undersigned counsel, as his answer to the amended complaint filed by the plaintiff, adopts as if fully set forth herein his answer filed in response to the original complaint filed by the plaintiff.

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been mailed to all counsel of record listed on the attached service list this 2 day of May, 2001.

BADIAK, WILL & KALLEN  
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By: \_\_\_\_\_

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75/107

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 01-60-Civ-LENARD  
MAGISTRATE JUDGE SORRENTINO**

**TWON ADAMS,**

Petitioner,

vs.

**MOTION FOR EXTENSION OF TIME  
DUE TO LACK OF RECORDS**

**CHARLES MATTHEW,**

Respondent(s).

The Respondent, the State of Florida, through undersigned counsel, moves this Honorable Court for an extension of time of forty-five (45) days, within which to file a response in the above styled cause, and in support thereof, would respectfully show that:

1. The Respondent's response is currently due to be filed with this Court. Respondent has not previously requested an extension of time in this matter.
2. The undersigned counsel was just recently assigned this case and, as such, has not had the opportunity to obtain and review Petitioner's prior files from archives, which files are necessary to prepare the response due in this matter. An additional forty-five (45) days is therefore needed within which to complete a review of the files/documents and prepare a competent response.
3. This request for extension of time is made in good faith and not for the purpose of unnecessary delay.

WHEREFORE, Respondent, by and through undersigned counsel, respectfully requests that this Court enter its order granting the Respondent a forty-five (45) day extension of time within

*[Handwritten signature and date 11/02]*

06-837 CV

RETURN OF SERVICE		
Service of the Summons and Complaint was made by me <sup>1</sup>	Date May 1, 2001	
Name of Server Emil Schanzenbach, Jr.	Title	
Check one box below to indicate appropriate method of service		
<p>Served personally upon the defendant. Place where served _____  <u>875 Third Avenue, New York, NY 10022</u></p> <p>Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.            Name of person with whom the summons and complaint were left: _____</p> <p>Other (specify) _____</p>		
STATEMENT OF SERVICE FEES		
Travel \$134.80	Services \$180.00	Total \$334.80
DECLARATION OF SERVER		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.</p> <p>Executed on <u>May 1, 2001</u> _____            Date</p> <p style="text-align: right;">_____            Signature of Server</p> <p style="text-align: right;"><u>1605 Concord Rd. Wyomissing, PA</u>            Address of Server  <u>19610</u></p>		

1) As to who may serve a summons see Rule 4 of the Federal Rules of Civil Procedure.

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